

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re	) Chapter 11
	)
W.R. GRACE & CO., et al.,	) Case No. 01-01139 (JKF)
	) (Jointly Administered)
	)
Debtors.	) Re: Docket No. 13406
	)

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**CLAIMANT EPEC REALTY INC.'S  
SUBMISSION OF THE EXPERT REPORT OF  
ENVIRONMENTAL RESOURCE CONSULTANTS (ERC)  
REGARDING THE SCHEDULE FOR THE ADJUDICATION OF LACK  
OF HAZARD ISSUES, AS DESCRIBED IN THE 15<sup>TH</sup> OMNIBUS OBJECTIONS**

In accordance with the Court's Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims, dated October 13, 2006 (D.I. 13406), Claimant EPEC Realty Inc. hereby submits their Submission of the Expert Report of Environmental Resource Consultants ("ERC") Regarding the Schedule for the Adjudication of Lack of Hazard Issues, as Described in the 15<sup>th</sup> Omnibus Objections.

I.

On December 7, 2006, the D&H PD Claimants filed their Preliminary Designation of Fact and Expert Witnesses Regarding Adjudication of Lack of Hazard Issue as described in the 15<sup>th</sup> Omnibus Objection (D.I. 13953). On December 22, 2006, the D&H PD Claimants filed their Supplemental Designation of Fact and Expert Witnesses Regarding Adjudication of Lack of Hazard Issue as Described in the 15<sup>th</sup> Omnibus Objection (D.I. 14155). In these pleadings the D&H PD Claimants identified expert and fact witnesses for the hazard adjudication phase, and the subject matter of their testimony. Claimant EPEC Realty Inc. hereby fully incorporates by

reference all matters set forth therein in their Preliminary and Supplemental Designation of Fact and Expert Witnesses, including the exhibits and attachments.

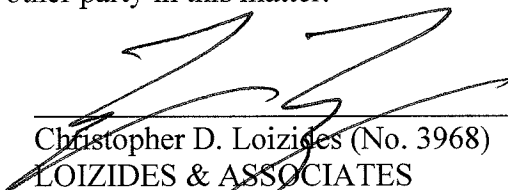
II.

Claimant EPEC Realty Inc. is contemporaneously filing the Expert Report of ERC in its claim file (Claim Nos. 5593 and 5672) and hereby fully incorporates by reference the entire ERC Report and all matters set forth therein. Claimant EPEC Realty Inc. hereby submits the Summary of Expert Report of ERC, which is described in Exhibit "A" attached hereto. Nevertheless, Claimant's Counsel will provide Debtors' with a copy of this Report if requested.

III.

The D&H PD Claimants reserve the right to supplement this submission with other additional expert reports and/or documentation and further reserve the right to call any other expert or fact witnesses designated by any other party in this matter.

DATED: January 9, 2007



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**SUMMARY OF EXHIBITS**

EXHIBIT A: Summary of Expert Report of Environmental Resource Consultants (“ERC”)